State of California
Regional Water Quality Control Board
North Coast Region

Lisa Bernard
August 25, 2008

Executive Officer's Summary Report
8:30 a.m., September 11, 2008
North Coast Regional Water Board
Hearing Room
5550 Skylane Blvd., Suite A
Santa Rosa, California

Item: 3

Subject: Proposed Waste Discharge Requirements for Humboldt Creamery Dairy Products Processing Facility, NPDES No. CA0005584, WDID NO. 1B8085OHUM

DISCUSSION

Humboldt Creamery (hereinafter Permittee) is currently discharging pursuant to Order No. R1-2002-0041 and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0005584. The Permittee submitted a Report of Waste Discharge, dated October 10, 2006**,** and applied for a NPDES permit renewal to discharge treated and untreated wastewater from the Humboldt Creamery**,** hereinafter Facility. The application was deemed complete on June 3, 2008.

The Permittee owns and operates a dairy products processing facility. Products produced at the facility include dry condensed and evaporated products, ice cream and frozen deserts, and fluid milk. Process wastewater generated at the facility consists of milk tanker truck washout, acid and caustic rinse water, boiler blow down, and waste products from the wash down processes including but not limited to cleaning of dairy processing equipment. Between May 16th and September 30th each year, process wastewater also includes dry condensed milk condensate and non-contact cooling water. The treatment system consists of an aeration pond and a settling pond. Treated process wastewater is discharged from Discharge Point 001 via irrigation to approximately 150 acres of grazed pasture land adjacent to the Eel River.

Between October 1st and May 15th each year, condensate from the dry condensed milk manufacturing process and non-contact cooling water may be discharged directly from the Facility at Discharge point SN002 (see table on cover page) to the Eel River, a water of the United States, within Ferndale hydrologic subarea of the Eel River watershed. Alternatively, the condensate from the dry condensed milk and non-contact cooling water may be treated with the rest of the process wastewater generated at the Facility. The treated process wastewater is discharged from Discharge Point SN001 via irrigation to approximately 150 acres of grazed pasture land adjacent to the facility and bordering the Eel River.

The Permittee treats and discharges domestic wastewater through an onsite septic and leachfield system. The system includes three 1,800 gallon septic tanks installed in

series. The first two tanks are designed to collect solids and greases. The third tank is designed to function as a dosing tank for the distribution of primary treated effluent to the pressurized leachfield system. The dosing tank contains four 1 horsepower pumps, which pump effluent to two alternating leachfields of 1,800 linear feet each. Five float switches in the dosing tank automatically activate the pumps as well as audible and visual alarms during times of system malfunction. Section VI.C.6.b. of the proposed Order requires the Permittee to comply with statewide storm water regulations.

The proposed Order No. R1-2008-0020 contains significant changes from the existing permit, Order No. R1-2002-0041, as follows:

1. Effluent limitations for surface water and land discharge locations will be designated for the first time. Effluent limitations for discharges to surface water have been designated for biochemical oxygen demand (BOD), total suspended solids (TSS), and pH. Effluent limitations for discharges to land have been designated for BOD, ammonia nitrogen, nitrite, nitrate, total dissolved solids, sodium, and aluminum.

2. During the periods of surface water discharge, effluent monitoring for surface water discharges has been increased commensurate with other minor dischargers under NPDES permit in the North Coast region, including BOD, TSS, pH, whole effluent toxicity, and priority pollutants.

3. During the periods of surface water discharge, receiving water monitoring has been expanded to more closely reflect requirements imposed on NPDES discharges throughout the Eel River basin. The new constituents to be monitored at varied frequencies include Eel River flow, dissolved oxygen, specific conductance, pH, turbidity, visual observations, and priority pollutants.

4. Effluent monitoring for land discharges has been increased to characterize constituents with potential to impact receiving water quality including BOD, ammonia nitrogen, nitrite, nitrate, total dissolved solids, sodium, aluminum and manganese.

5. Groundwater sampling and analyses for the first time. Quarterly groundwater monitoring will be required for depth to water, ammonia nitrogen, nitrite, nitrate, total dissolved solids, sodium, aluminum and manganese.

6. The proposed Order requires the Discharger to conduct four special studies to 1) develop of a *Toxicity Reduction Evaluation (TRE) Workplan* in preparation for instances of identified toxicity through effluent monitoring, 2) a Land *Disposal Evaluation* to demonstrate appropriate salt, nutrient, and irrigation management practices, 3) a *Facility Capacity Evaluation* to determine the treatment and disposal limitations of the existing facility, and 4) a *Compliance Schedule* that requires evaluation of sodium and total dissolved solids generation, treatment, and effluent

concentrations during a one year interim period for which the newly designated effluent limitations for those constituents will be held in abeyance.

A copy of the draft permit and/or information to access the draft on the Regional Water Board website was mailed to the Permittee, interested agencies, and persons.

This item was opened for public comment between July 1, 2008 and August 14, 2008. The Permittee submitted comments and concerns related to the proposed Order on August 14, 2008. In response to some of the Permittee's concerns, Staff modified draft Order R1-2008-0020. Staff provided technical justification for maintaining the original requirements in the draft Order for items which could not be modified. The full agenda package includes copies of correspondence between the Permittee and Regional Water Board staff as well as a redline version of the proposed Order showing all modifications.

PRELIMINARY STAFF RECOMMENDATION: Adopt proposed Order No. R1-2008- 0020 as proposed.